

Comments on Notice of Inquiry:  
Violent Television Programming and Its Impact on Children  
MB Docket No. 04-261 (FCC 04-175)

### **Initial Comments**

This issue of violence on TV must include Cable TV. Excluding cable TV programming and/or commercials is creating special pleading (violence on TV needs to be dealt with - but violence on cable TV is OK?). This would be government double talk.

If it was in our country's interest to desensitize every citizen to violence (for whatever reason) then the best possible way would be to try and expose the people (and children most of all ) regularly to graphic violence until they are numb to it. This could most readily and economically be accomplished through the home TV. Since in the real world it is not in our country's interest to desensitize the citizenry to violence then just the opposite course of action is called for - namely do not try to expose the people (and children most of all ) regularly to graphic violence. There is enough violence to deal with in real life. We do not need more.

### **Section A: Incidence of Violent Programming**

My wife and I have a 7 year old daughter. We are trying to help her grow physically, mentally, and spiritually with good traditional morals such as having respect for others and treating others as you yourself would like to be treated. In this regard we consider TV mostly as an adversary; an information/entertainment source that she can use only with extreme caution on our part. One of the reasons for this is the nearly constant stream of violence that current TV programming and commercials contain.

While it is possible to control what show or channel is watched it is impossible to know in advance what commercials are coming along with the show. We cannot sit down as a family and watch the Olympics (or any other show for that matter) without constantly changing channels during commercial breaks due to the graphic violence shown - and this is not even part of the show. It could be an advertisement for a theater release or another TV show but it will contain the most horrific scenes to catch viewers or some grisly dialog with thriller background music. In a few minutes they will have fought, slashed, shot, killed, screamed, bloodied, and flashed intense human violence situations on the TV... and then returned to the show! This is an outrage and should not be allowed to continue. No violence in commercials that exceeds the violence of the show period. This topic brings to mind an incident - not long ago ABC aired Disney's Peter Pan at night. My daughter and I watched the movie together and I was forced to change channels again and again due to the content of the commercials. The final offense came at the end of the movie. The movie credits just started rolling and ABC immediately went to a commercial for some other TV show with a bloody scene of someone shot, lying in an alley in a pool of blood! As a parent I say this is rotten and evil. Think of the many children watching this program without a parent paying close attention to what was shown during the commercials. The majority of the time I just don't want to play commercial editor anymore and the TV stays OFF.

Also, we live in the Central Time Zone. Shows that are allowed at 8pm in the Eastern Time Zone are allowed at 7pm in Central Time? Same goes for 9pm shows ET which are shown 8pm CT? How can this possibly be rationalized except to benefit the broadcasters. This is affecting millions of children yet there is not one mention of this in this NOI (nor the commercial issue presented above). So the children in CT are more able to handle TV violence with no adverse impact than ET children and so require less protection? Or maybe they are less important because they are not in the Washington / New York corridor. This needs to be straightened out immediately regardless of what comes out of the current effort.

The Congress, the Senate, even the FCC need to put the people, and specifically the children, first. That is before the interests of the broadcast corporations, before the advertisers, and before the desires of the entertainment elite must come the children.

It seems to me that the majority of high level executives in the entertainment industry as well as high level government officials and government representatives may not have young children at home anymore. They personally do not have any idea what it is like to raise children today and still permit TV viewing. They are not watching TV from their child's perspective, they don't see the recoiling and the flinches, they are not there when their child has to cover their eyes while all kinds of violence is happening on the living room screen. But there are millions of people who are personally living this and trying to cope with TV violence everyday. WE NEED HELP!

## **Section B. Effects of Viewing Violent Programming**

It seems there is an abundance of documentation linking undesirable child behavior/development and exposure to violent TV. Recently a number of studies have found strong links between violence on TV (and in video games) and violent behavior in young children. Also it goes directly against common sense and practice to entertain the idea that violent TV programming is not harmful to children or neutral in nature. The slightest violence in the home is never justified or tolerated and certainly would never pass for entertainment or education. There is no debate on why this is so. It is readily apparent that exposure to violence in the home is disruptive at best and destructive at worst. We try to teach our children to occupy their time and energy in constructive ways and encourage wholesome entertainment/activities. Just the opposite is presented on the TV - with violence leading the way. The government takes a hypocritical position by allowing the entertainment industry and associates to nullify the effects of violence and make the viewer at fault somehow while claiming the opposite for advertising - that it does have large influence among viewers!. How about siding with the people instead of the educated elite trying out their latest theory? At least err on the side of caution - it does not harm a child in any way not to view TV violence!

## **C. Defining Violent Programming**

Defining what is violent is not difficult if it is made personal. If an act or event were to happen to yourself or a loved one you would have absolutely no difficulty in determining if it contained violence, nor would there be any problem identifying the level of violence. It is when we try to depersonalize violence that we run into trouble spelling everything out. Children, on the other hand, will personalize violence all the time. They are concerned for the victims of violence on TV, they get disturbed personally when someone is hurt or killed on the screen. They also personalize TV violence by fearing that violence may happen to them. Whether their thoughts are rational or not, children are still affected personally by the violence they see on TV and this is not surprising since they are growing and learning which is a highly personal experience.

Graphic violence on TV is not necessary for the education of children. In fact it is a sensationalistic detractor from learning. Instead of quality content, leading to understanding and awareness, graphic violence will be strewn throughout as if the only thing worth presenting on a topic were the death and dying details. Are we to believe that no one could really learn about President Lincoln until the advent of color TV and acted out assassination portrayals? Does anyone believe we are better educated in anything because of the violent scenes on TV? Maybe those who like to get bad ideas. Edutainment violence adds practically nothing to our understanding and speaks of pure entertainment, which is really the goal anyway. There are children's programs on public TV which are very successful at teaching history without graphical depictions of violence.

## **D. Parental Guidelines and V-Chip**

The V-chip is useless until commercials are rated the same as programming! Also, unless ratings/coding actually reflect the morals and sensibilities of families with children, instead of the entertainment corporations and their friends, any electronic/automated system will be worthless.

### **E. Safe Harbor**

Safe Harbor, such as setting certain times for certain levels of violence, is a great idea. For instance, the most violent TV should be limited to after 10pm local time (that is 10pm ET, CT, MT, and PT) when most children are asleep. Whatever the specific details that make up the safe harbor I believe it must include the following:

1. Apply to Cable TV as well as broadcast TV.
2. Apply to all commercials as well as programs.
3. Apply to local time zone time (8pm in ET is not the same as 7pm CT and never was, never will be!).

Children do not differentiate between cable TV and broadcast TV. Dealing with violence on TV must address both TV delivery methods equally and with the children in mind.

Children do not shut off viewing TV when a commercial is shown. Violence in commercials must be treated the same as regular programming.

Children in the central time zone are exposed to programming that children in the eastern time zone are protected against (7pm CT = 8pm ET, 8pm CT = 9pm ET). Different standards for different time zones should be illegal!

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